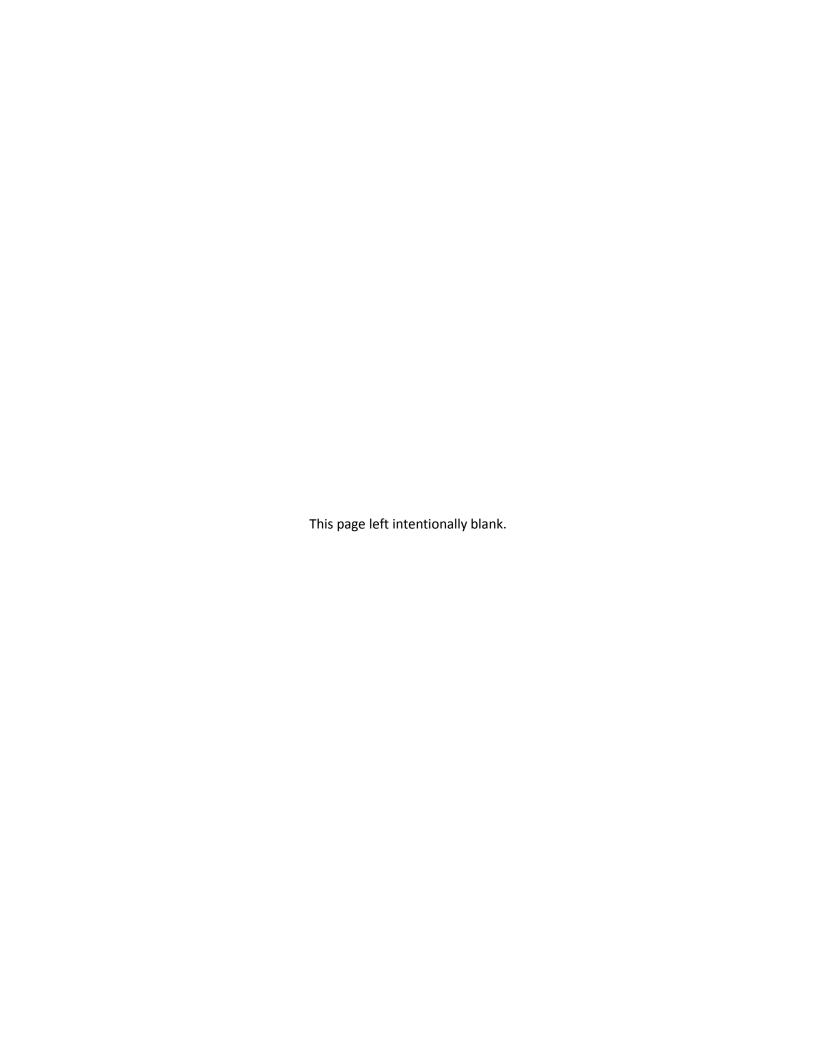
Appendix B Impact Avoidance and Minimization Measures



Appendix B presents the impact avoidance and minimization measures (Table B-1) that would be implemented by the commercial lessee (unless otherwise noted) as part of each alternative for each resource area, as applicable.

Table B-1
Impact Avoidance and Minimization Measures for the Action Alternatives (1 and 2)

Туре	Time Frame*	#	Applies to Alternative(s)	Action and Description
General	Short-term	G-1	1 and 2	The lessee or contractor will be required to prepare an Environmental Protection Plan that will describe how the mitigation, impact, avoidance and minimization measures presented in this table will be implemented.
Air Quality (A)	Short-term	A-1	1 and 2	Proper and routine maintenance of all vehicles and equipment will occur to ensure that emissions are within design standards.
А	Short-term	A-2	1 and 2	Dust suppression methods (such as using water trucks to wet the disturbed areas and any soil stockpiles during rehabilitation and construction and covering stockpiles with tarps or other physical barriers) will minimize fugitive dust emissions.
А	Short-term	A-3	1 and 2	Rehabilitation and construction activities will not occur when wind speeds exceed 25 miles per hour.
А	Short-term	A-4	1 and 2	The best available engine technologies will be utilized on construction vehicles, when available (United State Environmental Protection Agency [USEPA] Tier 4 standards).
А	Short-term	A-5	1 and 2	As applicable, in accordance with South Coast Air Quality Management District Rule 403 on Fugitive Dust, a Fugitive Dust Plan would be prepared if the selected alternative resulted in daily earth moving that exceeded the threshold to become considered a "large operation." If the selected alternative qualifies as a large operation, then all work shall conform with the requirements set forth in Rule 403.
Water Resources (W)	Short-term	W-1	1 and 2	The contractor would prepare and implement a project-specific construction stormwater pollution prevention plan (SWPPP) and all applicable best management practices (BMPs) for each location, in accordance with the Construction General Permit from initiation through completion of construction activities. Appropriate BMPs will be implemented in accordance with the Construction General Permit that meet requirements for Best Available Technology and Best Conventional Pollutant Control Technology to reduce or eliminate pollutants from entering receiving waters. These BMPs generally fall into four main categories: erosion control, soil stabilization, sediment control, and non-stormwater management. BMPs may include but not be limited to the following: a. Stabilize disturbed soils through erosion and sediment control measures. b. Revegetate disturbed areas with native or naturalized plant species consistent with the surrounding vegetation once rehabilitation and construction is complete. c. Protection of storm drains around the rehabilitation and construction sites with sediment control (e.g., fiber rolls

Туре	Time Frame*	#	Applies to Alternative(s)	Action and Description
				 and sediment traps). d. Storage of hazardous materials with proper secondary containment, and establishment of designated vehicle and equipment maintenance areas. e. Management of spills and leaks from vehicles and equipment through inspections and use of drip pans, absorbent pads, and spill kits. f. At the Marine Terminal, appropriate BMPs (e.g., pier-level containment partitions, in-water containment boom) will be implemented (as warranted) to minimize the potential for construction debris to enter the Port of Long Beach harbor.
W	Short-term	W-2	1 and 2	If groundwater is encountered, dewatering wells or sumps may be used to lower the water table a few feet below the impacted excavation area. All groundwater encountered would be captured, sampled, and pretreated before discharge in accordance with the project-specific construction SWPPP.
W	Short-term	W-3	1 and 2	A stormwater collection system consisting of drainage swales, catch basin inlets, and drain pipes would be installed by the lessee to drain water away from the new infrastructure and discharge into the stormwater system. Drainage swales would be installed to reduce stormwater sheet flow across roadways.
W	Short-term	W-4	1 and 2	If any additional soil or groundwater contamination is found during the rehabilitation process, a follow-on site investigation and restoration project would be initiated. Cleanup would be negotiated with the California Department of Toxic Substances Control Certified Unified Program Agency and the Los Angeles Regional Water Quality Control Board. This process would include analysis of any such contamination and ensure that any potentially contaminated soil or groundwater would be disposed of in accordance with applicable federal, state, and local regulations.
W	Short-term	W-5	1 and 2	Due to the conversion of pervious to impervious ground cover associated with future development, it is recommended that a stormwater study be conducted by the lessee to determine the ability of the existing storm water infrastructure to accommodate the additional flow. The stormwater collection system would be designed and implemented based on the stormwater study and in compliance with Unified Facilities Criteria 3-210-10 and Section 438 of the Energy Independence and Security Act of 2007.
W	Long-term	W-6	1 and 2	New SWPPPs would be prepared by the lessee for the Main and Marine Terminals in compliance with all regulatory requirements applicable to post-rehabilitation/construction site conditions and activities, to curtail any potential future impacts to water resources.

Туре	Time Frame*	#	Applies to Alternative(s)	Action and Description
Geological Resources (G)	Short-term	G-1	1 and 2	A geotechnical/engineering evaluation will be conducted to determine the engineering measures and guidelines for restoration of excavations, compacting of soils, and slope stabilization. The evaluation will also evaluate whether additional drainage diversion/control will be needed on the slopes. The potential for increased landslides and erosion will be minimized by following a site engineering plan that identifies appropriate fill materials, compaction to engineering standards, appropriate angles for the reconstructed slopes, and drainage control to stabilize the reconstructed slopes. Examples of engineering controls could be:
				a. The use of benched slopes on the steep hillsides; andb. Concrete-lined drainage ditches to direct runoff away from the reconstructed slopes.
G	Short-term	G-2	1 and 2	During rehabilitation and construction, contractors will be required to use a specified laydown area for the vehicles and equipment, drive on existing roads as much as possible, use of stabilized construction entrance/exit to minimize sediment from being carried offsite by vehicle tires, and use erosion-prevention BMPs such as: a. Covering soil piles at the work site; b. Using silt barriers to prevent soil loss from runoff; and c. Revegetating reconstructed slopes to provide a surface cover to protect the soil from erosion.
G	Short-term	G-3	1 and 2	Any new ASTs would be constructed by the lessee in compliance with the applicable Unified Facilities Criteria requirements for seismic design so that they would not pose any increased risk of earthquake-related injury/damage. In areas where existing closed-in-place USTs underlie proposed construction, the USTs would be replaced with structural fill per the geotechnical engineer's recommendations. Standard seismic engineering data would be used to minimize potential effects of seismically induced ground movement such as severe shaking, lateral spreading, or slope failure.
G	Short-term	G-4	2	The lessee would be limited in their allowed disturbance of the sediment under Pier 12, in compliance with appropriate standard operating procedures and testing requirements. The lessee would be required to observe the institutional controls that have been implemented to prevent disturbance of the sediment under Pier 12.
G	Short-term	G-5	1 and 2	Soil material would be temporarily stockpiled in generally flat and previously developed/disturbed areas, and appropriate erosion control BMPs would be implemented in accordance with a project-specific construction SWPPP and in compliance with coverage under a Construction General Permit. Excavated areas would then be compacted to engineering standards and graded to approximate existing slope contours. Exposed areas would be revegetated to provide a surface cover to protect the soil from erosion
Biological Resources (B)**	Short-term	B-1	1	The project area will be accessed using existing roads. Parking, driving, lay-down, stockpiling, and vehicle and equipment storage will be limited to previously compacted and developed areas within the Operations Area. No off-road vehicle use will be permitted beyond the Operations Areas and designated access routes, except as addressed in #B-2.
В	Short-term	B-2	1	To minimize impacts to biologically sensitive areas, construction access routes will be determined in coordination with Naval Facilities Engineering Command Southwest biologists during the design phase, and delineated in the construction plans. This

Туре	Time Frame*	#	Applies to Alternative(s)	Action and Description
				access route will be clearly marked and will be considered part of the project activity zone. Biologically sensitive areas will be clearly marked on project activity plans, and avoided by personnel and equipment.
В	Short-term	B-3	1	At least seven days before project initiation, the limits of the project boundary, including temporary features such as staging areas, will be clearly marked with flagging, fencing, or signposts. All project-related activities will occur within the project boundary. Limits of the project activity zone will be clearly marked on construction plans. No unauthorized personnel or equipment (including off-road vehicle access) will be allowed outside the project activity limits or designated access routes.
В	Short-term	B-4	1	Should night work be authorized, any night work will involve shielding all lighting away from sensitive areas.
В	Short-term	B-5	1	A contractor education program will be conducted during all project phases and will cover the potential presence of listed species; the requirements and boundaries of the project; the importance of complying with avoidance, minimization, and compensation measures; and problem reporting and resolution methods.
В	Short-term	B-6	1	All trash generated by demolition activities will be disposed of properly. All food-related trash will be placed in sealed bins or removed from the site regularly. Following initial project activities, all equipment, waste, and project debris will be removed from the site, and the soil will be re-contoured before habitat restoration.
В	Short-term	B-7	1	Staging areas, laydown areas, and/or other temporary project activity-related requirements will be located within the Operations Area, in already disturbed areas or non-sensitive habitat types.
В	Short-term	B-8	1	Use of shoring or other excavation stability measures to reduce areas of impact may be employed where practicable.

Туре	Time Frame*	#	Applies to Alternative(s)	Action and Description
В	Short-term	B-9	1	A Project Biologist will be on site when work is being done in and/or adjacent to identified habitat areas. These identified habitat areas with an appropriate buffer will be included on project maps and drawings. The Project Biologist will identify work areas, monitor work activity, provide "tailgate" sessions for the demolition contractor, and oversee and execute the impact avoidance and minimization measures pertaining to biological resources. The Project Biologist will have experience with listed and sensitive species, including Palos Verdes blue butterfly (PVB), that occur or have the potential to occur in the project area. Before demolition activities, a qualified biologist will conduct pre-project clearance surveys to ascertain the demolition area is not being used by federally listed species. The following measures will be used to minimize and avoid impacts to PVB eggs, larvae, and adults within listed species management areas: a. When practical, activities will avoid the flight season (February 15 to May 31); b. For activities that require work within the flight season, the following measures will be implemented to minimize impacts to PVB; i. Hostplants will be censused within the project footprint; ii. All hostplants, including a 2-foot buffer around their canopies, will be avoided where possible; and iii. All work will be conducted during daylight hours to allow adult PVB to escape impacts.
В	Short-term	B-10	1	The following measures are designed to minimize impacts to habitat for federally listed species: a. If access to work areas cannot be provided from existing roadways, construction equipment will access work areas by rolling over (crushing) existing vegetation; b. If vegetation must be cleared for equipment access, vegetation will be cut at its base to avoid uprooting shrubs; c. If substantial soil disturbance is necessary in high quality habitat as determined by a United States Fish and Wildlife Service (USFWS) -approved biologist, topsoil will be salvaged and replaced following impact; i. If additional seeding and/or planting are determined to be necessary, seeds or clippings will be collected from Defense Fuel Support Point (DFSP) San Pedro to ensure appropriate plant stock is used, and the appropriate seed mix will be determined by the Project Biologist. PVB hostplants will be included in the seed mix; d. Where temporary habitat impacts are unavoidable, impacted areas will be restored and habitat restoration plans will be forwarded to the USFWS for review prior to implementation. If the USFWS does not respond within 30 days, DFSP San Pedro will assume that the USFWS has no concerns with the plans and proceed with the restoration.
В	Short-term	B-11	1	The following measures will be used to minimize and avoid impacts to coastal California gnatcatcher (CAGN): a. The biologist will monitor demolition activities. The Project Biologist will conduct pre-activity surveys for CAGN s and their nests in and within a 100-foot wide buffer surrounding the impact area. These surveys will be conducted within the week before the initiation of brush clearing, grading, or other demolition activities. The Navy will coordinate with the USFWS to determine appropriate nest survey frequency. Areas that have been surveyed would be flagged, and any vegetation that is required to be removed for purposes of demolition would be removed outside the breeding season.

Туре	Time Frame*	#	Applies to Alternative(s)	Action and Description
				 b. Dust migration in or adjacent to Coastal Sage Scrub areas will be minimized by lightly spraying areas of exposed soil with water during excavation activities when weather conditions require the use of dust control measures. c. The following measures will be employed if active CAGN nest(s) are detected within the immediate area of project impacts or within the surrounding 100-foot wide buffer: i. If practical, demolition activities will be avoided within 100 feet of a nest until the nest fails or juveniles successfully fledge as determined by the Project Biologist. ii. If any active CAGN nest (nest containing eggs or an empty or partial nest with CAGNs actively exhibiting breeding behaviors) occurs within 100 feet of proposed demolition area, the Project Biologist will report the nest to the Navy. The Project Biologist will use the distance to the project limits and local topography to determine if demolition activities are likely to directly damage a nest or disturb nesting activities. Signage will be installed to deter people from entering any area within an active CAGN nest. iii. Where damage or disturbance of any CAGN nest(s) is likely, Naval Weapons Station Seal Beach will implement further measures to avoid the likelihood of nest destruction or disturbance, including temporarily halting clearing activities until the nest fails or until at least 10 days after young fledge from the nest. Demolition activities will be directed to other areas farther from the active nest(s) where the activities will not disturb the active nest(s). iv. The Project Biologist will monitor nest progress, demolition activity, and protective fencing to minimize potential demolition-related disturbance and submit a weekly nest status report to Naval Weapons Station Seal Beach. A post-demolition report will be submitted to the USFWS summarizing the weekly nest status report and outcomes within six months of project completion.
В	Short-term	B-12	1	Due to the presence of Migratory Bird Treaty Act habitat within the project area, a qualified biologist will conduct pre-activity surveys for migratory birds and their nests within the project area and associated buffer area. The areas will be flagged; any vegetation needing to be removed for demolition will be removed prior to breeding season.
В	Short-term	B-13	1	The contractor performing the closure activities will be required to prepare a Revegetation Plan that is consistent with the DFSP Integrated Natural Resources Management Plan (INRMP). The Revegetation Plan will address all revegetation efforts associated with the project activities and include specific erosion control measures, irrigation requirements, species composition, seed mix origins and ratios for that particular habitat, weed control, water regimes, maintenance activities, success criteria, and monitoring requirements. The Revegetation Plan will apply to all soil disturbance and will include the following: a. The Operations Area will be reseeded with native species. b. The Habitat Area (Listed Species Management and Habitat Opportunity Areas) will be restored with habitat plantings specific to the PVB and CAGN, as appropriate.

Туре	Time Frame*	#	Applies to Alternative(s)	Action and Description
				 c. To minimize and avoid impacts to CAGN following project completion, all suitable and/or occupied CAGN habitat that is temporarily impacted by project activities will undergo appropriate restoration activities (e.g., re-contouring, planting, and weeding). Restoration will be conducted consistent with the Restoration Plan. d. Revegetation methods for habitat areas will be consistent with the INRMP and include seeding and/or planting of container stock, salvaged plants, cuttings, or other propagules collected or propagated from a local native plant nursery or locally collected sources, including any sensitive plant species that will be impacted during soil disturbance or other project activities. Plants from local nurseries will use clean, weed-free soil. e. Reseeding/replanting that becomes necessary after the start of the rainy season will be done as soon as possible.
В	Long-term	B-14	1	Areas impacted by project activities will be inspected by the Navy within one year following the completion of project activities to determine whether any remedial measures, such as re-seeding/re-planting, weed control, watering, and/or erosion control, are required. Up to five years of post-restoration monitoring within disturbed habitat areas will occur. Invasive weed control (e.g., hand removal, mechanical, and herbicide control) will be implemented in areas reseeded/replanted until the native vegetation is established. This will be conducted as part of the established Habitat Management Program and incorporated into the Habitat Management Plan and INRMP.
В	Long-term	B-15	B-15 1	The project will minimize the potential for invasive plant species (i.e., weeds) or soil pathogens to become established in disturbed areas and spread into Listed Species Management Areas as well as minimize the risk of habitat degradation from the invasion of nonnative vegetation into Listed Species Management Areas. Invasive plant species generally include those species listed by the California Invasive Plant Council (Cal-IPC) and any species that can invade natural or restoration areas and replace or preclude the establishment of native or other more desirable species. Invasive Species (as listed by the Cal-IPC "high" and "moderate" categories) will be prevented from establishing in temporarily disturbed areas by biological monitoring and removal if discovered. The following measures will be implemented: a. Vegetation characteristics will be monitored annually within habitat areas using study areas defined in Longcore (2007). Monitoring will occur following the PVB flight season each year. The following characteristics will be estimated: i. Three permanent transects will be established in each survey area to estimate percent cover of native shrubs, native forbs, nonnative grasses, nonnative forbs, and bare ground.
				 ii. For each study area, a qualified biologist will provide a narrative that describes which invasive species pose the most important threats to habitat. b. The following species will be eradicated from the Listed Species Management Areas, and any new invasion will be eliminated annually: giant reed (<i>Arundo donax</i>), Peruvian peppertree (<i>Schinus molle</i>), and iceplant (<i>Carpobrotus edulis</i>). Eradication techniques will avoid PVB hostplants with a buffer (2 foot) around hostplant canopies and follow guidelines described in CAGN minimization measures.

Туре	Time Frame*	#	Applies to Alternative(s)	Action and Description
				c. A qualified biologist will maintain and continually update a list of nonnative plants that are known to quickly invade and degrade native habitat in the vicinity of DFSP San Pedro. If plant species with rapid colonization and invasion potential are observed within the Listed Species Management Areas, they will be the highest priority for annual weed management. This list will initially include: spurge (<i>Euphorbia terracina</i>), castor bean (<i>Ricinus communis</i>) and pampas grass (<i>Cortaderia selloana</i>);
				d. Other nonnative plants will be managed as part of habitat maintenance using the approaches as deemed appropriate by a biologist:
				 Routine nonnative vegetation control will be implemented using hand tools, including hand-held power tools such as weed trimmers, without the use of chemicals.
				ii. To minimize impacts to PVB adults, use of powered weed trimmers or other potential disturbance-inducing methods will be avoided during the PVB flight season (February 15 to May 31) within areas determined to be occupied by monitoring and areas mapped as potentially occupied by PVB.
				iii. In problematic areas, herbicides will be applied by certified pesticide applicators as needed using the following guidelines provided in the 2010 BO (FWS-LA-08B0606-08F0704 Conservation Measure 6 [USFWS 2010a]).
				iv. No herbicide will be applied within 2 feet of any coast locoweed (<i>Astragalus trichopodus var. lonchus</i>) or deerweed canopy.
				e. Using data from vegetation sampling, each study area will be assessed to determine whether it meets the following criteria in regards to the severity of nonnative plant dominance.
				i. If the relative ratio of nonnative plant cover to native plant cover for any study area exceeds 1:1, the biologist will initiate vegetation management for that study area during the same calendar year.
				ii. If nonnative vegetation remains above this threshold two years later, the biologist will contact the USFWS and DFSP San Pedro to coordinate remedial actions, which may include supplemental seeding to enhance success.
				The following measures will be used to conserve PVB at the DFSP San Pedro:
D	Long torm	ong-term B-16	9-16 1	 a. DFSP San Pedro will maintain a captive breeding program to support PVB protection and recovery and continue monitoring following methods described in the 2010 BO (FWS-LA-08B0606-08F0704 Conservation Measure 1 [USFWS 2010a]).
В	Long-term			b. PVB populations will be monitored via annual PVB surveys along transects that have been sampled since 1999 and as described in 2010 BO (FWS-LA-08B0606-08F0704 Conservation Measure 2 [USFWS 2010a]).
				 Restore suitable habitat to existing conditions following demolition according to the Revegetation Plan. Habitat areas will be restored with habitat plantings specific to the PVB and CAGN.

Туре	Time Frame*	#	Applies to Alternative(s)	Action and Description
В		B-17	1	Continued operation of the onsite native plant nursery.
Land Use (L)	Short-term	L-1	1 and 2	Although facilities built on federal property are exempt from state and local building codes, the Navy will require the lessee to follow state and local building codes to the maximum extent practicable.
Visual Resources (V)	Short-term	V-1	1	To the extent practicable, the lessee would be required by the Navy to preserve existing vegetation and trees on the Main Terminal to reduce visual impacts to the surrounding viewshed.
V	Short-term	V-2	1	The lessee would be encouraged to consider the visual impacts of the facilities and infrastructure they are proposing to construct to consider visual screening and landscaping improvements where practicable.
V	Short-term	V-3	2	The lessee would be required to develop structures and facilities at the Marine Terminal that would be of a similar size, mass, and height of those existing to the maximum extent practicable, to ensure no dramatic change to visual setting.
Noise (N)	Short-term	N-1	1 and 2	The lessee would comply with all applicable laws and regulations including Navy requirement, to the fullest extent practicable. In addition, the following measure will be implemented: a. The lessee will provide advanced notification of proposed rehabilitation and construction activities and associated rehabilitation and construction hours to the community.
N	Short-term	N-2	1 and 2	San Pedro (City of Los Angeles Department of Building and Safety) permits construction activity between 7 A.M. and 9 P.M., Monday through Friday; 8 A.M. to 6 P.M. on Saturdays or holidays; and no work allowed on Sunday. Construction activity at the Marine Terminal would follow a similar construction window dictated by the City of Long Beach. All construction activity would conform to local regulations to occur within the specified window whenever possible and receive prior approval from the city for exceptions.
Infrastructure (I)	Short-term	I-1	1 and 2	The lessee would divert as much demolition waste from landfills as possible using demolition deconstruction techniques to reduce, reuse, or recycle the various types of waste. Demolition material would be recycled to the maximum extent practicable and when not feasible, the material would be categorized and sent to an appropriate disposal facility.
Transportation (T)	Short-term	T-1	1 and 2	Western Avenue would not be used for repair or rehabilitation and construction-related trips to/from DFSP San Pedro.
Public Health and Safety (P)	Short-term	P-1	1 and 2	The lessee shall gain approval from the Navy for any changes to security procedures relating to commercial staff or other members of the public accessing DFSP San Pedro (Main or Marine Terminals).
Р	Short-term	P-2	1 and 2	The lessee shall ensure any products used in their operations that are transferred via the same system as the military fuels (F-76 and JP-5/JP-8) are compatible, and ensure any installed system has a way to be purged and checked to confirm the quality of fuel at fuel delivery points at Pier 12 (to confirm delivered products are meeting Military Specifications [MILSPEC] quality requirements).

Туре	Time Frame*	#	Applies to Alternative(s)	Action and Description
Р	Short-term	P-3	1 and 2	The lessee shall implement inspection, testing, and monitoring procedures as well as safety measures at least as stringent as those that DFSP San Pedro was functioning under during the historical fully operational condition.
Р	Short-term	P-4	1 and 2	The lessee shall ensure appropriately rated roads are be used by tankers, and that tankers would not be travel on public roads at times of major traffic congestion in the local community.
Hazardous Materials and Wastes (H)	Short-term	H-1	1 and 2	Before the start of rehabilitation and construction activities, a site-specific Health and Safety Plan will be prepared and submitted for the Navy's approval, and all necessary permits and approvals will be obtained. The Health and Safety Plan will include detailed precautionary measures to substantially reduce potential exposure of on-site personnel to petroleum waste, hazardous waste, and potentially explosive gases. All on-site personnel handling or working in the vicinity of the contaminated soil will be trained in accordance with Occupational Safety and Health Administration regulations for hazardous waste operations. These regulations are based on Code of Federal Regulations 1910.120 (e) and 8 California Code of Regulations 5192, which states that "general site workers" shall will receive a minimum of 40 hours of classroom training and a minimum of three days of field training. This training provides precautions and protective measures to reduce or eliminate hazardous materials/waste hazards at the work place. The site-specific Health and Safety Plan will describe the strategy for handling and disposing of all construction debris. Part of this strategy will be to divert as much of the construction waste from landfills as possible using techniques to reduce, reuse, or recycle the various types of waste. Any required asbestos, lead, or polychlorinated biphenyl abatement will be conducted before rehabilitation and construction activities begin. The removal methods, health and safety procedures, and disposal methods will conform to the applicable regulations of federal, state, and local regulatory agencies, including any required notifications.
н	Short-term	H-2	1 and 2	Before the start of rehabilitation and construction activities, Lessee will coordinate with the Navy and Regional Water Quality Control Boards, Los Angeles Region, to determine whether demolition of underground and aboveground pipelines will potentially damage existing monitoring wells, remediation wells, and aboveground remediation equipment. In the event that such a scenario occurs, an environmental monitor, knowledgeable of on-site remediation equipment, will be present during underground pipeline demolition activities to verify that subsurface wells and remediation equipment are not damaged.
Н	Short-term	H-3	1 and 2	The Lessee shall be required to strictly comply with all applicable hazardous waste management and permitting requirements under RCRA and/or its applicable state equivalent.
Cultural Resources (C)	Short-term	C-1	1 and 2	Halt work orders shall will be given if ground-disturbing activities were to encounter an unexpected archaeological discovery.

Notes: *Time frames are either short-term (during rehabilitation and construction) or long-term (during operations).

^{**}These conditions were required as part of the Biological Opinion (FWS-LA-15B0317-15F0042) prepared for the 2016 EA with Finding of No Significant Impact (FONSI).

All applicable measures would still be mandated, and all references to demolition would apply to rehabilitation and construction under the Proposed Action. In addition, these measures apply only to the Main Terminal where the biologically sensitive areas have been identified.